

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. __06-_____
v.	:	DATE FILED: _____
GREGORY TRICE	:	VIOLATIONS:
	:	18 U.S.C. § 1343 (wire fraud - 2 counts)
	:	18 U.S.C. § 1028A (aggravated identity theft - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of Forfeiture

INDICTMENT

COUNT ONE THROUGH TWO

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Don Rosen Imports, 1312 Ridge Pike Conshohocken, Pennsylvania was engaged in the business of selling cars, specializing in Porsche and Audi sales. As a car dealership, the business sought loans and leases for cars. To process the loan and lease applications, the dealership required a loan application be completed with the correct personal identification of the buyer.

2. Don Rosen Imports sent the completed loan applications to lenders. Based on the applicant's representation, the lending institution acted on the application.

THE SCHEME

3. Between in or about September 16, 2005 and in or about November 11, 2005 in the Eastern District of Pennsylvania and elsewhere, defendant

GREGORY TRICE

devised and intended to devise a scheme to defraud car dealerships and loan institutions, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

4. Defendant, GREGORY TRICE, fraudulently used stolen identities to obtain car loans and automobiles.

It was further part of the scheme that:

5. Defendant GREGORY TRICE unlawfully used names, identification and identifying information of others including date of birth and social security number, without their permission or authority, to make applications for car loans and leases.

6. Based on defendant GREGORY TRICE'S misrepresentation, lenders approved the loan applications.

7. On or about September 16, 2005, defendant GEORGE TRICE appeared at Don Rosen Imports to buy a 2000 Porsche 911. Defendant TRICE completed a loan application using the stolen identity of G.F. including the social security number, date of birth, and address of G.F. in Maryland. Defendant TRICE presented a Maryland driver's license with the name and address of G.F. but containing a picture of defendant TRICE. Defendant TRICE also provided a Pennsylvania address for G.F. of 4000 Gypsy Lane, Philadelphia.

8. The true G.F. lives in Maryland and had his identity stolen. The true G.F. gave no one permission to buy a car in his name or use his credit and personal information.

9. On or about September 16, 2005, Don Rosen Imports faxed defendant GREGORY TRICE'S fraudulent loan application to Porsche Financial Services which approved the application and financed the loan on defendant TRICE'S purchase for \$42,186.60.

10. On or about November 11, 2005, defendant GREGORY TRICE appeared at Don Rosen Imports, 1312 Ridge Rd, Conshohocken, Pennsylvania to purchase a 2002 Audi A6. Defendant TRICE used the name and identifying information of G.F. to complete a loan application. Defendant TRICE provided a Maryland driver's license with the information of G.F. and a picture of defendant TRICE.

11. Don Rosen Imports forwarded defendant GREGORY TRICE'S application to lenders via the internet.

12. VW Credit, Inc. approved the loan application for a loan of \$31,263.00.

13. On or about each of the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

GREGORY TRICE,

for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below, each transmission constituting a separate count:

COUNT	DATE	DESCRIPTION
1	September 16, 2005	Facsimile transmission: from Don Rosen Imports, Pennsylvania to Porsche Financial Services, Illinois.
2	November 11, 2005	Wire transmission: loan application in the name of G.F. via the internet from Don Rosen Imports, Pennsylvania to Illinois.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

From in or about September, 2005 through in or about November, 2005, in the Eastern District of Pennsylvania, and elsewhere, defendant

GREGORY TRICE

knowingly and without lawful authority transferred, possessed, and used and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, the name, social security number, and date of birth of G.F. during and in relation to a wire fraud in violation of Title 18, United States Code, Section, 1343.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES:

1. As a result of the violation(s) of Title 18, United States Code, Section 1343, described in Counts One and Two of this Indictment, the defendant

GREGORY TRICE

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity,” i.e., wire fraud, including, but not limited to the following:

- A. The sum of \$73,449.60 in United States currency (forfeiture money judgment).
- B. 2000 Porsche 911, VIN: WPOCA2990YS651474.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney